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12 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
Palo Verde Solar II, LLC, Blythe Solar Power Proj.
13 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 MMR GROUP, INC.,
19 MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC,

20 Plaintiffs.

21 || vs.

22 STA DEVELOPMENT, LLC (F/K/A SOLAR
23 MILLENNIUM, LLC), SOLAR TRUST OF
24 AMERICA, LLC, SOLAR MILLENNIUM AG,
25 SOLAR MILLENNIUM, INC., CA I-10
26 SOLAR, LLC, PALO VERDE SOLAR I, LLC,
27 PALO VERDE SOLAR II, LLC, BLYTHE
28 SOLAR POWER PROJECT UNIT 1, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
UNIT 3, LLC AND BLYTHE SOLAR POWER
PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**FOURTH STIPULATION TO
EXTEND DEFENDANTS' TIME TO
RESPOND TO AMENDED
COMPLAINT AND [PROPOSED]
ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA
DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request
that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
by two weeks from December 5, 2011 to December 19, 2011.

12 On November 4th and 14th, the parties requested, and this Court later granted, a one-week
13 extension of time for the STAD Defendants to respond to the Amended Complaint because the
14 parties were in advanced stages of settlement discussions. On November 22, 2011, this Court
15 granted a third extension for two weeks extending the time for the STAD Defendants to respond
16 from November 21 to December 5 due to the Thanksgiving holiday and continued progress in
17 settlement negotiations. That progress has continued and the parties remain hopeful that they will
18 execute a settlement agreement forthwith. The parties therefore request another two-week
19 extension of the time for the STAD Defendants to respond to the Amended Complaint. The
20 parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial
21 economy, the parties therefore request that Court extend the STAD Defendants' time to respond
22 to the Amended Complaint by two weeks from December 5 to December 19, 2011.

1 Dated: December 1, 2011

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By: /s/ Aaron Renenger

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Blythe Solar Power Project Unit 3, LLC and
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Dated: December 1, 2011

**WATT, TIEDER, HOFFAR
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By: /s/ Nicholas A. Merrell

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

_____ UNITED STATES DISTRICT COURT JUDGE